

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI  
EASTERN DIVISION**

**POWERTRAIN, INC., A MISSISSIPPI  
CORPORATION**

**PLAINTIFF**

**VS.**

**CIVIL ACTION NO. 1:11-cv-000105-SA-DA**

**JOYCE MA, INDIVIDUALLY, AND  
BEST MACHINERY & ELECTRICAL, INC.**

**DEFENDANTS**

**JOYCE MA, INDIVIDUALLY**

**COUNTER-  
PLAINTIFF**

**VS.**

**POWERTRAIN, INC., A MISSISSIPPI  
CORPORATION**

**COUNTER-  
DEFENDANT**

**JOYCE MA, INDIVIDUALLY**

**THIRD-PARTY  
PLAINTIFF**

**VS.**

**WILLIAM H. SHAWN, An Individual, and  
SHAWNCOULSON, LLP, a Washington, DC  
Limited Liability Partnership**

**THIRD-PARTY  
DEFENDANTS**

---

**DEFENDANT JOYCE MA'S OPPOSITION TO THE RULE 15(a)  
MOTION FOR LEAVE TO AMEND FILED BY PLAINTIFF  
POWERTRAIN, INC.**

---

COMES NOW, Defendant, Joyce Ma, the individual (“Ma”), and files her Opposition to Plaintiff Powertrain Inc.’s Rule 15(a) Motion for Leave to Amend the Complaint. Ma has attached her Points and Authorities in Support of this Opposition.

**WHEREFORE**, Ma respectfully requests the Court to deny Plaintiff Powertrain Inc.’s Rule 15(a) Motion for Leave to Amend the Complaint. Alternatively, Ma respectfully requests the Court to allow sufficient time, comparable to the time allowed for Ma to discover the cause of action of breach of contract, for Ma to perform adequate discovery for the vastly expanded scope of this lawsuit.

Dated: November 26, 2012

Respectfully Submitted,

JOYCE MA  
DEFENDANT/THIRD PARTY PLAINTIFF

By /s/ Jeffery M. Navarro  
JEFFERY M. NAVARRO  
P.O. BOX 162  
AMORY, MS 38821  
662-256-3706  
MBN: 3755  
Attorney for Defendant/Third Party Plaintiff,  
Joyce Ma

### **CERTIFICATE OF SERVICE**

I hereby certify that on this 26th day of November, 2012, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Jeffery M. Navarro

Jeffery M. Navarro